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July 13, 2022

Project No. CF167-1906

Ms. Madi Novak  
Remedial Project Manager, Superfund and Emergency Management Division  
U.S. Environmental Protection Agency, Oregon Operations Office  
805 SW Broadway, Suite 500  
Portland, OR 97205-3331

Subject: **Q2 April 1–June 30, 2022 Quarterly Progress Report, Arkema Project Area  
Administrative Settlement Agreement and Order on Consent for Remedial  
Design at the River Mile 7 West Project Area  
U.S. EPA Region 10 CERCLA Docket No. 10-2020-0054**

Dear Ms. Novak:

On behalf of Legacy Site Services LLC (LSS), agent for Arkema Inc. (Arkema), Integral Consulting Inc. (Integral) prepared this quarterly progress report for work performed on the Arkema Project Area. This progress report is being submitted in accordance with Section 4.1 of Appendix A1, Arkema Statement of Work for the Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area (CERCLA Docket No. 10-2020-0054) entered into by Arkema and the U.S. Environmental Protection Agency (EPA) with an effective date of February 21, 2020.

- a) Actions that have been taken toward achieving compliance with the Settlement:
- On April 1, 2022, Integral, on behalf of LSS, sent a revised sewer buffer memo to Madi Novak at EPA and followed up with EPA regarding the request for individual data validation reports for 2021 data.
  - On April 4, 2022, EPA approved Field Change Request (FCR)-17, Vibracore Step-Outs into the Navigation Channel, submitted on March 30, 2022.
  - On April 5, 2022, LSS continued Phase 1 Arkema vibracore sampling in RM7Wa.
  - On April 7, 2022, Chris Castelli of the Oregon Department of State Lands (DSL) sent an email to LSS indicating that Condition 12.16, of 63309-RAAA (the Oregon DSL permit), had been met. Condition 12.16 states the following:

Sewer Main Buffer. Holder shall not commence work within the area identified as “Sewer Main Buffer” in Exhibit E; until such time that a Sewer Main Avoidance Plan is reviewed and concurred with by the City of Portland and submitted to the State upon concurrence.”

- On April 13, 2022, Integral, on behalf of LSS, submitted the Q1 2022 quarterly progress report to EPA.
- On April 14, 2022, EPA, as part of the continuing development of the Remedial Design Guidelines and Considerations document, sent LSS guidelines to evaluate uncertainties in sediment management area delineations.
- On April 25, 2022, EPA approved a request from LSS for additional step-out cores 150 ft from Stations SC-56-O, SC-60-O, and SC-64-O.
- On April 26, 2022, EPA approved a request from LSS for additional step-out cores 150 ft from Stations SC-52-O2, SC-47-O, SC-47-O2, SC-67-O2, and SC-72-O2.
- On April 30, 2022, Integral, on behalf of LSS, sent a sediment coring update to EPA for the sampling period April 4–28, 2022.
- On May 3, 2022, EPA approved a request from LSS for step-in cores SC-60-O1 and SC-64-O1.
- On May 4, 2022, EPA approved a request from LSS to reoccupy SC-36 to collect sediment samples for chlorobenzene analysis.
- On May 6, 2022, EPA approved a request from LSS for step-in core SC-56-O1.
- On May 10, 2022, EPA approved FCR-18, Vibracore Step-Outs and Step-Ins to Delineate Chlorobenzene, submitted on May 9, 2022.
- On May 11, 2022, Integral, on behalf of LSS, sent a sediment coring update to EPA for the sampling period May 3–6, 2022.
- On May 26, 2022, Integral requested a meeting with EPA and LSS to discuss Phase 1 and 2 process, scheduling, reporting, and planning.
- On June 1, 2022, EPA, LSS, and Integral had a conference call meeting to discuss Phase 1 and 2 process, scheduling, reporting, and planning.
- On June 3, 2022, per EPA’s request, Integral, on behalf of LSS, provided an email summarizing the HxCDF risk issues.

- On June 23, 2022, Integral, on behalf of LSS, provided an email to EPA regarding changes to the investigation schedule as a result of changes in subcontractor availability.
- b) List of all results of validated sampling, tests, and all other data received or generated by Respondent Arkema to comply with the Settlement:
  - Continued to receive preliminary riverbank soil data.
  - Continued to receive preliminary sediment data.
- c) List of all deliverables that Respondent Arkema submitted to EPA:
  - Two FCRs were submitted to EPA during this period (see Section f below).
- d) List of all activities scheduled for the next quarter:
  - Continue receiving and validating data for the Phase 1 sediment coring.
  - Continue receiving and validating data for the riverbank soil sampling.
  - Continue analyzing subsequent riverbank soil and sediment core samples based on their respective decision trees in the Pre-design Investigation (PDI) Work Plan.
  - Continue planning, coordination, and subcontracting for the completion of the Phase 1 sediment coring sampling effort, the geotechnical coring, groundwater study piezometer installation work, Phase 1 groundwater study work, and Phase 2 sediment work.
- e) Information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Arkema RD Work, and a description of efforts made to mitigate those delays or anticipated delays:
  - The Phase 1 PDI work in accordance with the EPA-approved PDI Work Plan is approximately 55 percent completed.
  - To date, 87 coring stations have been cored and sampled (SC-36 was re-sampled). The remaining sediment coring fieldwork will commence in Q3 2022.
- f) List of any modifications to the work plans or other schedules that Respondent Arkema has proposed or that have been approved by EPA:
  - FCR-17: Vibracore Step-Outs into the Navigation Channel. Submitted on March 30, 2022; EPA approved on April 4, 2022.

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- FCR-18: Vibracore Step-Outs and Step-Ins to Delineate Chlorobenzene.  
Submitted on May 9, 2022; EPA approved on May 10, 2022.
- g) List of all activities undertaken in support of the CIP during the reporting period  
and those to be undertaken in the next quarter:
  - LSS participated in the June 8, 2022, Portland Harbor Collaborative Group  
meeting as an observer. LSS intends to be an observer at the next Collaborative  
Group meeting scheduled for September 14, 2022.

Please contact me at (503) 943-3614 or Mike Pinto at (484) 437-1991 if you have any  
questions or comments pertaining to this progress report.

Sincerely,



Eron Dodak, R.G.  
Senior Consultant